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June 5, 2012

By ECF

The Honorable Sandra L. Townes  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

***Re: United States v. William F. Boyland, Jr.,  
11 Cr. 850 (SLT) (EDNY)***

Dear Judge Townes:

We represent Defendant William F. Boyland, Jr., in the above-referenced matter, and are writing to request a modification of his conditions of release to permit him to travel to Columbia, South Carolina, to spend this weekend, specifically, this Saturday, June 9, 2012, through Monday, June 11, 2012, with friends.

Mr. Boyland is presently at liberty on an appearance bond that restricts his travel to the States of New York and New Jersey. However, we are writing to request authorization for Mr. Boyland to travel to, and stay at, 225 Cogburn Road, Columbia, South Carolina. The purpose of this request is to allow Mr. Boyland the opportunity to attend an anniversary party. He would then return directly to Albany, New York, to tend to his work in the New York State Assembly.

Please be advised that we have communicated with Assistant United States Attorney Lan Nguyen, and the Government does not object to the instant application.

Respectfully submitted,

/S/

Michael K. Bachrach  
Richard H. Rosenberg  
*Attorneys for Defendant William F. Boyland, Jr.*

MKB/mb

cc: AUSA Lan Nguyen (by ECF)